

PD
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

DARUS LEON HUNTER and KENYA JUANITA

SHUJAA

(In the space above enter the full name(s) of the plaintiff(s).)

- against -

CITY OF PHILADELPHIA

17 0889
Amended
COMPLAINT
Jury Trial: ☒ Yes ☐ No

(check one)

FILED

MAR 08 2017

KATE BARKMAN, Clerk
By _____ **Dep. Clerk**

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

I. Parties in this complaint:

- A. List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff	Name	<u>DARUS LEON HUNTER, KENYA JUANITA SHUJAA</u>
	Street Address	<u>1242 S. 51st Street, 1st floor (both parties)</u>
	County, City	<u>Philadelphia, Philadelphia (city)</u>
	State & Zip Code	<u>Pennsylvania 19143</u>
	Telephone Number	<u>215-303-8787, 215-727-1508 [home]</u>

- B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1 Name City of Philadelphia
Street Address 1515 Arch street, 17th floor
County, City Philadelphia county, Philadelphia city
State & Zip Code Philadelphia, Pennsylvania 19104

Defendant No. 2 Name Officer Naveedo ((City of Philadelphia police officer)
Street Address 65th street and Woodland ave.
County, City Philadelphia county, Philadelphia city
State & Zip Code Pennsylvania 19142

Defendant No. 3 Name Officer Schute (City of Philadelphi a police officer)
Street Address 65th street and Woodland ave.
County, City Philadelphia county, Philadelphia city
State & Zip Code Pennsylvania 19142

Defendant No. 4 Name _____
Street Address _____
County, City _____
State & Zip Code _____

II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. Only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case.

- A. What is the basis for federal court jurisdiction? (*check all that apply*)

☒ Federal Questions ☐ Diversity of Citizenship

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? Title 42 section 1983; use of excessive force. Deprivation of freedom.

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship _____

Defendant(s) state(s) of citizenship _____

III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? The events occurred at 1242 South 51st street, 1st floor in Philadelphia, Pennsylvania 19143

B. What date and approximate time did the events giving rise to your claim(s) occur? The events occurred from approximately 11:50 pm on 09/13/2015 until approximately 1:30 am on 09/14/2015

C. Facts: Please see attached page which details the events for which I seek relief.

What
happened
to you?

Who did
what?

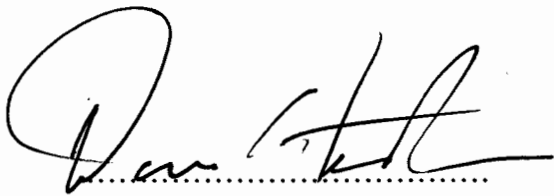
Was
anyone
else
involved?

Who else
saw what
happened?

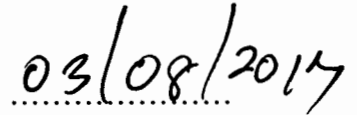
I DARUS LEON HUNTER was in my home on approximately 09/13/2015 at approximately 11:50 pm, when I heard a load banging on my front door. I got out of bed and walked into the living room. I noticed that my son Darus Jr. (16 yrs. old at the time of the incident) had opened the front door and two police officers were standing in the doorway and shining their flashlights into the faces of my daughters' Syriana Hunter (5 yrs. old at the time) and Khadira Muhammad. As they began to proceed into my home, I walked over and stood in their way and asked what they wanted. They asked where Khadira (my 7 year-old-daughter) was. As I escorted the officers to my front porch, I explained that she was in bed asleep. One of the officers told me to get Khadira up and out of bed. Her bed was a cot in my living room and she was in plain view of the officer. Officer Schute said that Khadira's mother (Cinquetta Muhammad) had come into the police station, complaining that our daughter was not home on time. After I woke her up I asked what he wanted me to do. While we were speaking, my girlfriend at the time and now my wife, Kenya Shujaa retrieved a copy of our existing custody order. I explained to the officer that all district schools were closed the following day and that my daughter Khadira was spending the night. I displayed the text messages in my telephone from the week before which demonstrated that Khadira's mother (Cinquetta Muhammad) and I had followed the same plan (Khadira spending Monday night at my house) when school was off for Labor Day. The officer looked at the documents and he and his partner left. I called the 12th district and stated that I wished to file a complaint against the (2) officers for attempting to walk into my home and shining their flashlights into my children's faces. I was told that I needed to call 911 in order to file a complaint. I called 911 and stated that I wanted to file a complaint against the officers. The 911 operator told me that I needed to call the police district where the incident occurred. I called the 12th district again and asked for a supervisor. My call was referred to a Sgt. Melner. He told me

that I needed to dial 911 in order to file a complaint against the officers and that he didn't have their names. At approximately 1:00 am, the officers (later discovered to be Naveedo and Schute) returned to my home. They were again banging on my door very loudly and violently. My then girlfriend and now wife, Kenya J Shujaa began opening the door when one of the officers forcefully pushed the door into her belly, knocking her backward. She was 18 ½ weeks pregnant at the time. I asked the officer "what the hell he was doing?" He told me to calm down and warned me not to get myself "locked-up". He stated "Oh you want to file a complaint against me, right?" I just said that I wanted him to leave me alone. He again shined his flashlight into my home. He and his partner left again. I called the 12th district again and was referred to Sgt. Melner who again told me that I needed to call 911 in order to file a complaint. The officers returned to my home for a third time at approximately 1:30 am and banged on and kicked my door. I opened the door and asked what the officers wanted. The officer (Schute) asked if I had a problem with him. I said that it was over and I just wanted to go to bed. The officers again left. I called 911 again and asked for a supervisor. The call was transferred to a Sgt. Hameen police radio #358. I told him what Sgt. Melner had stated and he (Sgt. Hameen) said that Sgt. Melner was lying if he claimed to not have the officers' names. I called back to the 12th district and asked for a supervisor and was again transferred to Sgt. Melner, who again told me that I needed to call 911 in order to file a complaint. I informed him of my conversation with Sgt. Hameen and that he had given me his police radio number. Sgt. Melner then informed me that the officers' names were Naveedo and Schute. I returned to bed. The following day, my daughter Khadira asked why the police were in my home. I told her that the police had made a mistake in coming to our house. On 09/14/2015, my girlfriend Kenya J. Shujaa, who was 18 1/2 weeks pregnant at that time, noticed a very slight, clear discharge of fluid on her leg. She continued to notice this

(usually when showering) for the next couple of days. She did not think this was anything serious. On the night of 09/16 /2015, Kenya began feeling very painful cramps. I Darus Hunter called 911 and Kenya was transported by a paramedic to Mercy Hospital. Kenya was then transported to HUP (Hospital at the University of Pennsylvania) where she was placed in the labor and delivery unit. Kenya Shujaa experienced a miscarriage. She has not been able to become pregnant since the incident which spanned from approximately 11:59 pm on 09/13/2015 until approximately 1:30 am on 09/14/2015.

A handwritten signature in black ink, appearing to read 'Darus Hunter Sr.', written over a dotted line.

Darus Hunter Sr.

A handwritten date '03/08/2017' in black ink, written over a dotted line.

Date

IV. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received. I Darus Leon Hunter continue to experience mental anguish and depression as a result of the US Constitutionally protected freedoms of Darus Hunter's family being violated.
Kenya Shujaa continues to experience depression and mental anguish as well as being unable to become pregnant since the miscarriage of 09/17/2015. The entire family has experienced loss, after the miscarriage of an impending family member.

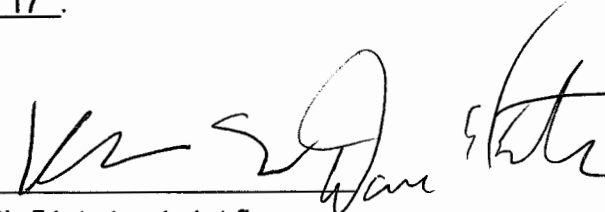
V. Relief:

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

I ask that the court enter a judgment in the amount of \$5,000,000.00. The basis of the award is \$2,000,000.00 in damages to the family of Darus Leon Hunter and the additional \$3,000,000.00 is sought in punitive damages and as a deterrent to the Philadelphia police department's abuse of Philadelphia's citizens.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this ____ day of February, 20 17.

Signature of Plaintiff(s) 

Mailing Address 1242 South 51st street, 1st floor
Philadelphia, Pennsylvania 19143

Telephone Number 215-303-8787, 215-727-1508 [home]

Fax Number (if you have one) _____

E-mail Address darus@sas.upenn.edu

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint. Prisoners must also provide their inmate numbers, present place of confinement, and address.

For Prisoners:

I declare under penalty of perjury that on this ____ day of _____, 20____, I am delivering this complaint to prison authorities to be mailed to the Clerk's Office of the United States District Court for the Eastern District of Pennsylvania.

Signature of Plaintiff: _____

Inmate Number _____



Exhibit B

CITY OF PHILADELPHIA
POLICE ADVISORY COMMISSION

P.O. BOX 147
Philadelphia, PA 19105-0147

215-685-0891

September 18, 2015

Mr. Darus Leon Hunter
1242 South 51st Street
Philadelphia, PA 19143

Exhibit A



pennsylvania
OFFICE OF OPEN RECORDS

STANDARD RIGHT-TO-KNOW REQUEST FORM

DATE REQUESTED: 09/28/2015

REQUEST SUBMITTED BY: ☒ E-MAIL ☐ U.S. MAIL ☐ FAX ☐ IN-PERSON

REQUEST SUBMITTED TO (Agency name & address): Lt. Edward Egenlauf

Philadelphia Police Department, 750 Race street Suite. # 203, Philadelphia, PA 19102

NAME OF REQUESTER: DARUS LEON HUNTER

STREET ADDRESS: 1242 South 51st Street

CITY/STATE/COUNTY/ZIP(Required): Philadelphia, Pennsylvania 19143

TELEPHONE (Optional): (215) 303-8787 EMAIL (optional): darus@sas.upenn.edu

RECORDS REQUESTED: **Provide as much specific detail as possible so the agency can identify the information.
Please use additional sheets if necessary*

I request the 911 recording transcripts of my 911 emergency calls placed on:

09/13/2015 at approximately 11:50 PM. and all subsequent calls placed on 09/14/2015 at approximately 12:00 am and later that day (09/14/2015).

DO YOU WANT COPIES? YES or NO : Yes, I request (3) copies of the transcript.
DO YOU WANT TO INSPECT THE RECORDS? YES or NO : I want to inspect the records.
DO YOU WANT CERTIFIED COPIES OF RECORDS? YES or NO : I want certified copies



CITY OF PHILADELPHIA
POLICE ADVISORY COMMISSION
P.O. Box 147
Philadelphia, PA 19105-0147



Mr. Darns Leon Hunter
1242 South 51st Street
Philadelphia, PA 19143

1914384344 0059

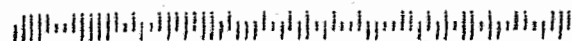


Exhibit B

Exhibit C



Penn Medicine

**The following document is a
Provider Exchange Document**

This document provides information about your hospital stay
for your primary care provider (family doctor).

**PLEASE TAKE THIS DOCUMENT WITH YOU
TO YOUR PRIMARY CARE PROVIDER AT
YOUR FOLLOW UP APPOINTMENT**

Exchange Document



Penn Medicine

Hospital of the University of Pennsylvania

Patient Name: SHUJAA, KENYA

Admit Date: 9/17/2015 3:45:00 AM

MRN/Visit#: 16772907 / 134381699

Discharge Date: 9/17/2015 4:28:48 PM

Birth Date: 7/23/1973

HUP

Philadelphia, PA
 SHUJAA, KENYA
 July 23, 1973
 Born

Female
 Sex

Insurer

1004011062
 Patient Id

1242 S. 51ST ST
 PHILADELPHIA, PA 19143
 Address

(215) 748-4164
 Home Phone

Declined to Specify
 Language
 Black or African American
 Race
 Not Hispanic or Latino
 Ethnicity
 Never Married
 Marital Status

Emergency Contact

REGINA SHUJAA
 Guarantor

KENYA SHUJAA

Discharge Summary

Reason for Visit

Reason For Visit excluded/not available

Chief Complaint

Chief Complaint excluded/not available

Functional Status

Name	Dates	Details
Functional Status Health Issues excluded/not available		

Name	Dates	Details
Cognitive Status Health Issues excluded/not available		

Problems

Name	Dates	Details
Active Problems excluded/not available		

Hospital Admission Diagnosis

Name	Dates	Details
Labor and delivery indication for care or intervention (659.90)		

Hospital Discharge Diagnosis

Name	Dates	Details
Status post vaginal delivery (V13.29, Z87.42)		

Medications

Exchange Document



Penn Medicine

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Admit Date: 9/17/2015 3:45:00 AM

MRN/Visit#: 16772907 / 134381699

Discharge Date: 9/17/2015 4:28:48 PM

Birth Date: 7/23/1973

Name	Dates	Details
Medications excluded/not available		
Medications Administered		

Name	Dates	Details
Medications Administered excluded/not available		
Hospital Discharge Medications		

Name	Dates	Details
------	-------	---------

ibuprofen 600 mg oral tablet
1 tab(s) orally every 6 hours as
needed for pain
Quantity: 60

Started 17-Sep-2015

Comments: It is very important that you take or use
this exactly as directed. Do not skip doses or
discontinue unless directed by your doctor.
May cause drowsiness or dizziness.
Obtain medical advice before taking any
non-prescription drugs as some may affect the action
of this medication.

Take with food or milk.

Started 17-Sep-2015

Comments: Medication should be taken with plenty of
water.

Colace 100 mg oral capsule
1 cap(s) orally 2 times a day
Quantity: 60

**Prenatal Multivitamins with
Folic Acid 0.4 mg oral tablet**
1 cap(s) orally once a day
Quantity: 30

Started 17-Sep-2015

Comments: May discolor urine or feces.
Take with food or milk.

**Feosol 325 mg (65 mg
elemental iron) oral tablet**
1 cap(s) orally 2 times a day
Quantity: 60

Started 17-Sep-2015

Comments: Check with your doctor before becoming
pregnant.
Do not chew, break, or crush.
May discolor urine or feces.

Allergies

Name	Dates	Details
No Known Allergies		
Procedures		

Procedure	Dates	Details
Procedures excluded/not available		
Immunizations		

Name	Dates	Details
Immunizations excluded/not available		
Social History		

- Unknown if ever smoked

Vitals

Date	Test	Result	Details
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Exchange Document



Penn Medicine

Hospital of the University of Pennsylvania

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Admit Date: 9/17/2015 3:45:00 AM

MRN/Visit#: 16772907 / 134381699

Discharge Date: 9/17/2015 4:28:48 PM

Birth Date: 7/23/1973

Vital Signs excluded/not available

Results

Date	Description	Value	Details
17-Sep-2015	ABO Rh Type		
14:38	ABO Rh Interpretation	O POS	
14:38	Indirect Antiglob Test (Antibody Screen)		
	Antibody Screen	Negative ABSC	
14:38	Indirect Antiglob Test (Antibody Screen)		
	Antibody Screen	Negative ABSC	
10:01	CBC- w/out Diff (Heme Profile)		
	WBC (CBC)	21.0 THO/uL (High)	Range: 4.0 - 11.0 THO/uL
	RBC	3.25 MIL/uL (Low)	Range: 3.80 - 5.30 MIL/uL
	Hemoglobin	10.3 g/dL (Low)	Range: 12.0 - 16.0 g/dL
	Hematocrit (HCT)	31 % (Low)	Range: 36 - 46 %
	MCV	95 fL	Range: 80 - 100 fL
	MCH	32 pg	Range: 27 - 33 pg
	MCHC	33 g/dL	Range: 31 - 36 g/dL
	Platelet Count (PLT)	263 THO/uL	Range: 150 - 400 THO/uL
	RDW.	13.9 %	Range: 11.5 - 14.5 %
10:01	Urine Drug Screen		
	Ecstasy	Negative	
	Oxycodone	Negative	
	Drug Scr Notes	See Comment	
	Unconfirmed screening results must not be used for non-medical purposes (e.g., employment testing, legal testing). Unless indicated, the results of all screening tests for drugs of abuse will be confirmed by another chemical method (e.g. gas chromatography with mass spectrometry detection) and reported separately; however, the benzodiazepine drug class screening results are not routinely confirmed. The cutoff concentrations used for drugs of abuse		

Exchange Document



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MRN/Visit#: 16772907 / 134381699

Discharge Date: 9/17/2015 4:28:48 PM

Birth Date: 7/23/1973

screening are:

Amphetamines including

MDMA (ecstasy) 500 ng/mL

Barbiturates 200 ng/mL

Benzodiazapines 200 ng/mL

Cocaine metabolite 300
ng/mL

Ethanol 10 mg/dL

Methadone 300 ng/mL

Opiates (including

Oxycodone) 300 ng/mL

PCP 25 ng/mL

Tetrahydrocannabinol (THC)
50 ng/mL

Additional Information:

Screening for drugs of abuse
is performed byimmunoassays that detect a
drug, drug metabolite or drug
class. The concentration at
which the screening test can
detect a drug or metabolite
varies within a drug class.The urine drug concentration
must be greater than or equal
to the cut-off concentration to
be reported as positive.The ethanol screening test,
an alcohol dehydrogenase
enzymatic test, is selective
for ethyl alcohol.For any questions regarding
these screening tests or to
request benzodiazepine
confirmation test, please
contact the Toxicology
Laboratory at 215-662-3474 or
the Clinical Chemistry
Resident at 215-980-9770.Amphetamines
(AMPHI)Coc Metabolite
(COC-I)

Opiates (OPIA-I)

Negative

Negative

Positive

Positive results will be
confirmed by HPLC/Tandem

Exchange Document



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Hospital of the University of Pennsylvania

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Birth Date: 7/23/1973

		Mass spectrometry. (Abnormal)	
	Barbiturates (BAR-I)	Negative	
	Benzodiazepines (BENZO-I)	Negative	
	PCP (PCP-I)	Negative	
		Positive	
	THC Interpretation	THC 50ng/mL cutoff – Positive by EMIT immunoassay screening test. (Abnormal)	
	Ethanol (ETOH-I)	Negative	
	Methadone (METH-I)	Negative	
06:58	Thyroid Stimulating Hormone	0.72 uIU/mL	Range: 0.27 - 4.20 uIU/mL
06:00	HIV Antibody Screen	NONREACTIVE Specimen is considered NONREACTIVE for HIV-1 p24 Ag and HIV-1/HIV-2 Ab	
05:09	Beta-2-Microglobulin (Serum)	1.27 mg/L	Range: 1.10 - 2.40 mg/L
05:09	SPCPT		
	Prothrombin Time	16.9 second(s) (High)	Range: 11.2 - 13.5 second(s)
	INR.	1.4	
05:09	SPCPTT		
	APTT	34.7 second(s) (High)	Range: 20.8 - 34.4 second(s) Comments: The recommended therapeutic aPTT range for unfractionated heparin for most clinical indications is 55-80 seconds.
05:09	Blood Fetal Hemoglobin	<0.05	Range: <=.04

Treatment Plans

Name	Dates	Details	Intent
Please follow up at the Helen O Dickens Center in 2 weeks for an appointment. You should receive a call from Dena Baker regarding this			

Exchange Document



Penn Medicine

Hospital of the University of Pennsylvania

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Admit Date: 9/17/2015 3:45:00 AM

MRN/Visit#: 16772907 / 134381699

Discharge Date: 9/17/2015 4:28:48 PM

Birth Date: 7/23/1973

appointment, if you have not heard from her within a week, please call (215) 662-2730 to make an appointment or if you have any questions. The center is located on the first floor of the Gates Pavilion.

Name	Dates	Details	Goal
Plan Of Care Entries excluded/not available			

Instructions

- Instructions excluded/not available

Discharge Diet

- Additional Nutrition Information for Patient: A heart healthy diet is low in animal fat. Do not eat foods like bacon, sausage, whole milk, butter and fried foods. Instead eat foods that are baked, grilled or broiled. Eat fresh vegetables, whole grains, beans and fish.
- Standard Nutritional Information for All Patients: Eat healthy foods to decrease the risk of stroke, heart disease and other health problems. For a healthy diet, eat a wide variety of foods. Choose lean meats and fish. Eat fresh fruits and vegetables. Avoid fried foods. Choose foods that are low in sodium (low salt), sugar and fat.

Hospital Discharge Instructions

- Important Procedures (document date, operator, and complications if applicable): Spontaneous vaginal delivery after admission for preterm labor
- Vaccines Administered: No vaccines were given for this visit.
- Pending Test Results: Request DateName
 - 17 Sep 2015 03:58:00R/O Gonorrhea & Chlamydia DNA Assay
 - 17 Sep 2015 03:58:47RPR (Maternal)
 - 17 Sep 2015 05:09:20Blood Fetal Hemoglobin
 - 17 Sep 2015 05:09:20Beta-2-Microglobulin (Serum)
 - 17 Sep 2015 05:09:20Anticardiolipin Antibody
 - 17 Sep 2015 09:10:00Dilute Russel Viper Venom Time
 - 17 Sep 2015 09:10:00Beta 2 Glycoprotein 1
- Explain Reason for Admission (Patient Friendly): Preterm labor
- Standard Medication Instructions for All Patients: Take each medication as prescribed by your doctor. Keep a current list of your medication. If you have questions about your medications, ask your doctor or nurse.
- Core Measure Diagnosis: Not Applicable
- Standard Activity Level Information for All Patients: Once you are feeling better, make a plan to exercise. Discuss the plan with your doctor. The risk for heart disease and stroke goes down when you are active and normal weight.
- Activity Level for Patient (document any limitation, weight bearing status, and driving instructions): "Pelvic Rest" for 6 weeks: This means nothing in the vagina (no intercourse, tampons, douching, etc.) and no tub baths or swimming for the next 6 weeks.
You may have irregular bleeding for several weeks following your delivery. This is normal. If you have heavy bleeding such that you are soaking 1 pad in an hour for 2 hours, you should call your doctor or come

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to the Emergency Room.

If you have a fever of 100.4 or greater you should call your doctor or return to the Emergency Room.

It is normal to feel emotional and teary following delivery. If you experience the blues that last for more than two weeks or feel like you want to hurt yourself, or someone else, please call your doctor, go to the nearest emergency room or call the Psychiatry Emergency and Evaluation Center (PEEC) at 215 662 2121. The PEEC is located on the ground floor of the Ravdin building and is open 24 hours a day, 7 days a week. You should take it easy for 2 weeks. Only up/down stairs 1-2 times daily. No heavy lifting (heavier than the or a gallon of milk).

- How to reach your doctor for questions related to your hospital stay?: You were under the care of Obstetrics & Gynecology. Please call this doctor's office if you have any questions regarding your hospitalization or discharge instructions. If you need assistance locating your doctor's phone number, please call the hospital operator at 215-662-4000.
- Attending at Discharge: Dr. Kyra Williams
- Call Your Doctor If You Have Any of the Following Signs or Symptoms: Chest pain
Shortness of breath
Pain unrelieved with prescribed medicine
Redness, swelling or pus-like drainage from incision/wound
Unable to urinate
Nausea/vomiting
Diarrhea
Constipation
Fever greater than 100.4
- Heart Failure Instructions: Weigh yourself at the same time each day. Write your weight down to remember it. Talk to your doctor about your usual weight. Call your doctor if you go over your weight by more than 2 pounds in 2 days or 4 pounds in a week.
Call your doctor if you have:
Chest pain, pressure, or tightness
Problems breathing when resting or lying down
Constant cough
Weight gain of 2 pounds over 2 days
Feel faint or dizzy, or falling
- Call 911 If: Call 911 if you have a medical emergency or if you have any of the following sudden signs and symptoms of stroke:
Weakness or numbness on one side of the body
Drooping of the face on one side
Not able to talk or understand others' speech
Suddenly cannot see
Bad headache for no reason

Hospital Course

- ∴ 42 yo G3P0020 @ 18 weeks by FL in PEC presents with cramping, bleeding and leakage of fluid for several days. She was first examined in the PEC and found to have fetal parts in the vagina. US revealed no amniotic fluid and no fetal heart tones. Patient counseled for vaginal delivery and moved to labor and delivery.
Location of PNC: No prenatal care

Exchange Document



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Discharge Date: 9/17/2015 4:28:48 PM

Birth Date: 7/23/1973

Delivery Date: 9/17/2015

Labor: spontaneous

Anesthesia: IV fentanyl

Gestational Age at delivery: 18w0d

Delivery MD/CNM: Edelson / Vasquez

Mode of delivery:

vaginal: SVD c/b no laceration, with EBL 200

Intrapartum complications:

Neonatal Information: female; birthweight: 270g; Apgars: 0/0

Postpartum Course: No complications.

Feeding: n/a

Contraception: not decided

Advance Directives

Advance Directives excluded/not available

Encounters

Inpatient

Encounter Diagnosis: Status post vaginal delivery On 17-Sep-2015
LD-0012-X 03:45

Srinivas, Sindhu

Emergency

HUP Emergency Room Service On 10-Nov-2005

12:41

Emergency On 2-Nov-2005

HUP Emergency Room Service 05:03

Health Care Providers

General Acute Care Hospital (Attending)

Sindhu Srinivas ssrinivas11931
direct.uphs.upenn.edu
Address

Patient Contacts

Emergency Contact

REGINA SHUJAA Unknown
Address

Guarantor

KENYA SHUJAA 1242 S. 51ST ST (215) 748-4164
PHILADELPHIA, PA 19143 Home Phone
Address

Document Details

HUP
34th & Spruce St
Philadelphia, PA 19104
Address

Exhibit C

Exchange Document



Penn Medicine

Hospital of the University of Pennsylvania

Patient Name: SHUJAA, KENYA

Admit Date: 9/17/2015 3:45:00 AM

MRN/Visit#: 16772907 / 134381699

Discharge Date: 9/17/2015 4:28:48 PM

Birth Date: 7/23/1973

Sunrise Clinical Manager ; Transform 4.1.4.9
September 17, 2015 16:07 -0400
services services
Published

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Style Sheet V2.4

Exhibit C

PRELIMINARY HOSPITAL DISCHARGE SUMMARY

Please note that this Preliminary Discharge Summary has not been verified or co-signed by the Attending Physician. Please refer to the complete medical record for the final, signed document.

DISCHARGE SUMMARY



Penn Medicine

Hospital of the University of Pennsylvania

Patient Name: SHUJAA, KENYA

Admit Date: 9/17/2015 3:45:00 AM

MRN/Visit#: 16772907 / 134381699

Discharge Date: 9/17/2015 4:28:48 PM

Birth Date: 7/23/1973

Attending at Discharge

Dr. Kyra Williams

Diagnoses

Discharge Diagnosis:

Status post vaginal delivery

Procedures

Important Procedures:

Spontaneous vaginal delivery after admission for preterm labor

Vaccines:

No vaccines were given for this visit.

Hospital Course

42 yo G3P0020 @ 18 weeks by FL in PEC presents with cramping, bleeding and leakage of fluid for several days. She was first examined in the PEC and found to have fetal parts in the vagina. US revealed no amniotic fluid and no fetal heart tones. Patient counseled for vaginal delivery and moved to labor and delivery.

Location of PNC: No prenatal care

Delivery Date: 9/17/2015

Labor: spontaneous

Anesthesia: IV fentanyl

Gestational Age at delivery: 18w0d

Delivery MD/CNM: Edelson / Vasquez

Mode of delivery:

vaginal: SVD c/b no laceration, with EBL 200

Intrapartum complications:

Neonatal Information: female; birthweight: 270g; Apgars: 0/0

Postpartum Course: No complications.

Feeding: n/a

Contraception: not decided

Important Test Results

Pending Test Results:

Request Date Name

17 Sep 2015 03:58:00 R/O Gonorrhea & Chlamydia DNA Assay

17 Sep 2015 03:58:47 RPR (Maternal)

17 Sep 2015 05:09:20 Blood Fetal Hemoglobin

17 Sep 2015 05:09:20 Beta-2-Microglobulin (Serum)

17 Sep 2015 05:09:20 Anticardiolipin Antibody

17 Sep 2015 09:10:00 Dilute Russel Viper Venom Time

17 Sep 2015 09:10:00 Beta 2 Glycoprotein 1

Allergies

No Known Allergies

PRELIMINARY HOSPITAL DISCHARGE SUMMARY

Please note that this Preliminary Discharge Summary has not been verified or co-signed by the Attending Physician. Please refer to the complete medical record for the final, signed document.

DISCHARGE SUMMARY



Penn Medicine

Hospital of the University of Pennsylvania

Patient Name: SHUJAA, KENYA

Admit Date: 9/17/2015 3:45:00 AM

MRN/Visit#: 16772907 / 134381699

Discharge Date: 9/17/2015 4:28:48 PM

Birth Date: 7/23/1973

Discharge Medications

Medication	Instruction
Colace 100 mg oral capsule	1 cap(s) orally 2 times a day Medication should be taken with plenty of water.
Feosol 325 mg (65 mg elemental iron) oral tablet	1 cap(s) orally 2 times a day Check with your doctor before becoming pregnant. Do not chew, break, or crush. May discolor urine or feces.
ibuprofen 600 mg oral tablet	1 tab(s) orally every 6 hours as needed for pain It is very important that you take or use this exactly as directed. Do not skip doses or discontinue unless directed by your doctor. May cause drowsiness or dizziness. Obtain medical advice before taking any non-prescription drugs as some may affect the action of this medication. Take with food or milk.
Prenatal Multivitamins with Folic Acid 0.4 mg oral tablet	1 cap(s) orally once a day May discolor urine or feces. Take with food or milk.

Discharge Plans

Please follow up at the Helen O Dickens Center in 2 weeks for an appointment. You should receive a call from Dena Baker regarding this appointment, if you have not heard from her within a week, please call (215) 662-2730 to make an appointment or if you have any questions. The center is located on the first floor of the Gates Pavilion.

Disposition:

The patient was discharged to home in good condition.

Signatures

Discharge Summary Completed By: Lee, Daniel D (MD) [Sep 17 2015 12:14PM]

E. B. B. + D

Name: Shajaa, Kenya
Age: 47Y DOB: Jul 21, 1973
Gender: F We: 63.50kg Ht: 162.56 cm
MedRec: M000695537
AcctNum: PA1501041265
Attending: PLS
Primary RN: AVAR
Ref: ED ED ED11

MERCY PUEBLO PHIA DISCHARGE INSTRUCTIONS

Please read the information below, that is very important and you are the most important person in your ongoing health and well-being.

FINAL DIAGNOSIS

Threatened abortion

FOLLOWUP CONTACT

Follow up with your physician's office immediately after DC.

SPECIAL INSTRUCTIONS

You will be notified as to HUP OR for further evaluation.

MEDICAL INSTRUCTIONS

ABORTION, THREATENED

POSSIBLE MISCARRIAGE (Threatened Abortion)

During early pregnancy (first three months), it is not uncommon to have a small amount of bleeding. This can be entirely normal. But if heavy bleeding or severe cramping occur, it can be an early sign of miscarriage. A "miscarriage" means an unwanted loss of your pregnancy.

In about half of pregnancies threatened with miscarriage early pregnancy, the symptoms will stop and the pregnancy will continue normally. In some cases, however, miscarriage will occur. A miscarriage may occur due to various causes. These include chromosomal changes in the fetus, abnormal growth of the fetus, blood to the lower abdomen (vaginal) or too much progesterone. It is important to know that this is not the result of anything that you did wrong, and it will not make you any less of a mother or a person who is pregnant in the future.

HOME CARE: To improve the chances of a successful pregnancy, you should do the following:

- 1) Rest in bed and use crutches for walking.
- 2) Avoid sexual intercourse for 2-3 weeks.
- 3) Do not drink or use alcohol.

FOLLOWUP: Make an appointment with your doctor within the next week, or as directed by our staff.

DOOR: If you had an abortion, it will be reviewed by a specialist. You will be notified of any new findings that may affect your care.

GET BACK TO WORK: Call your doctor if any of the following occur:

- Vaginal bleeding or pain for more than three days

Exhibit D

Name: Shujaa, Kenya
Age: 42Y DOB: Jul 23, 1973
Gender: F- Wt: 63.50kg Ht: 162.56 cm
MedRec: M000695537
Accession: PA1303041246
Attending: PLS
Primary RN: AVAR
Bed: ED ED EDU

MERCY PHILADELPHIA DISCHARGE INSTRUCTIONS

- Heavy bleeding (soaking one pad an hour for three hours)
- Fever over 100.0° F (37.8° C)
- Wound pain
- Weakness, dizziness or fainting
- Passage of anything that resembles tissue, pink or grayish membrane or solid material (save and bring to the doctor)

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VERY IMPORTANT INSTRUCTIONS

You have agreed to make the necessary appointments/follow-up and take the prescribed medications/treatment. Do not drive if you have wounds, drink alcohol, use drugs, or are taking mind-altering medications. OR IF WE GAVE YOU MEDICINES THAT MAKE YOU DROWSY OR SEDATED. Call your doctor TODAY and tell him/her about this, wait and get further advice or make an appointment, if your problem persists or worsens, or if you develop any other symptoms of concern, return to the Emergency Room 215-746-9400. The exam and treatment you receive and history has been provided on an emergency basis only. You must follow-up with your family doctor or someone at the Philadelphia Health District clinic. DON'T STAY HOME WITH PROBLEMS.

REGISTRATION AND YOUR ABILITY TO PAY

Although you are discharged and not injured in discharge, it is impossible to always predict how any individual will react to anyone. Therefore, do not drive or place yourself in any dangerous situation for the next 24 hours. Even given medication in the ER. Many medications given in the ER may impair your ability to drive, react, or coordinate, impair your coordination, or otherwise decrease your ability to function. If you wish to discharge yourself, you have agreed to arrange for a safe way to get home from the ER after today's visit and you understand your discharge instructions and follow-up plan.

Exhibit D

Name: Shujaa, Kenya
Age: 42Y DOB: Jul 23, 1973
Gender: F Wt: 63.50 kg Ht: 162.56 cm
MedRec: M000663537
AccNum: PA1301041246
Attending: PLS
Primary RN: AVAR
Ref: ED ED ED11

MERCY PHILADELPHIA PROCEDURES AND TESTS

You were born in the Emergency Department on: Thu Sep 17, 2015

PROCEDURES PERFORMED

Emergency Dept Visit, 1 Key Components: Detailed Hx, Detailed Exam, Med Decision Mod Complexity
ULTRASOUND OB

TESTS PERFORMED

CBC WITH DIFF
HCG QUANTITATIVE
Set up for Pelvic Exam
TYPE AND SCREEN
Urine Dip (POC)
Urine HCG (POC)

RESULTS

No Information Available

Name: Shujaa, Kenya
Age: 42Y DOB: Jul 23, 1973
Gender: F Wt: 63.50 kg Ht: 162.56 cm
MedRec: M000995337
AccNum: PA1303041246
Attending: PLS
Primary RN: AVAR
Bed: ED ED11

MERCY PHILADELPHIA MEDICATION RECONCILIATION

You were seen in the Emergency Department on: Thu Sep 17, 2015

KNOWN ALLERGIES

No Known Drug Allergies

MEDICATIONS GIVEN WHILE IN THE EMERGENCY DEPARTMENT

Isosorbide dinitrate 0.9% IV (0.9% sodium chloride) - Dose: 1000 milligram(s) - IV Fluids

HOME MEDICATIONS

Med History Obtained

Notes from the emergency department

Reviewed with Patient



**INSTRUCTIONS FOR NURSING STAFF
PLANS FOR THE INFANT/FETUS REMAINS**

NAME

Exhibit E

SEX M F

MR

SHUJAA, KENYA

F

CSN 134381699

Age 42

ADI

MR 016772907

BD 07/23/1973

HAR 233753005

AD 09/17/15



HUP

AG



(PATIENT PLATE IMPRINT)

We received notification in December that the Pennsylvania Human Gift Registry will no longer accept fetal or infant remains beginning on January 1, 2009.

In the event of a fetal loss or death of a newborn, the nursing staff will need to explain the options to the mother and document the plan.

Nursing Responsibilities include

1. Explain the options as outlined on the attached form for handling the fetus/infant remains to the mother and family members.
2. Assist mother/family members to determine the plan.
 - If the mother is unsure about the plan (picks the third option on the form), the HUP morgue needs to know her plan within 10 days. Place this date on the form (10 days from fetal/infant loss).
3. Contact Pastoral Care if requested.
4. Place a patient identification sticker on the form titled: **"Instructions for Mothers/Families - Plans for the Fetus/Infant Remains"**.
5. Ensure that the mother indicates which option she is choosing by initialing one of the boxes and then signs the **"Instructions for Mothers/Families - Plans for Fetus/Infant Remains"** before she leaves the hospital.
6. Place the original signed form on the mother's chart.
7. Distribute copies
 - Send one copy to the HUP Morgue
 - Place one copy in Baby's chart (if baby had a medical record number generated at any time after birth)
 - Give one copy to the mother

**INSTRUCTIONS FOR MOTHERS/FAMILIES
PLANS FOR THE INFANT/FETUS REMAINS**

Exhibit E

We are very sorry for the loss (death) of your fetus/baby. Your nurse will help you plan the next steps. Please tell us how you want your baby's remains to be handled.

You may decide that you want to make arrangements for burial/cremation privately for your baby. The funeral director that you choose will help you. Your nurse can give you a list of funeral homes.

Some families want a funeral and others ask for the hospital to arrange for cremation and burial.

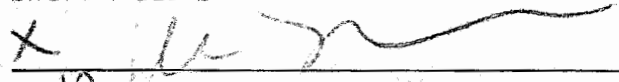
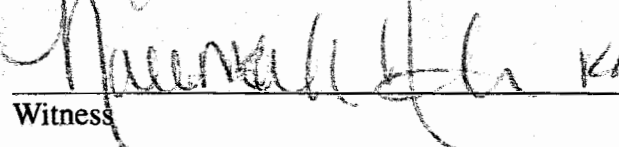
The hospital staff can arrange through a local funeral director for the cremation of your baby and burial of the ashes in Ivy Hill Cemetery.

Please let us know your choice by putting your initials in one of the boxes below and signing this form.

Initial One Box Below	Options
	<p>I will choose and call a funeral director to handle my baby's remains/body.</p> <ul style="list-style-type: none"> Name of Funeral Director is: _____ The Hospital can dispose of my baby's remains by cremation if I do not contact the Hospital of University of Pennsylvania morgue at 215-662-3214 within 10 days.
✓	<p>I want the hospital staff to contact a local funeral director to handle my baby's remains by cremation and burial at Ivy Hill Cemetery in a group grave.</p> <p>I understand that there is no charge for this service to me but that by choosing this option, I will not be able to obtain my baby's individual ashes after this happens.</p>
	<p>I am not sure what I want to do with my baby's remains. I know that I have 10 days to contact the Hospital of the University of Pennsylvania morgue with my plan.</p> <p>I know that I must call the Hospital of the University of Pennsylvania morgue 215-662-3214 by _____ (date) to tell the Hospital how I want the remains handled. If I do not do this in 10 days, I know that the baby will be cremated and the ashes buried in Ivy Hill Cemetery in a group grave. I understand that I will not be able to obtain my baby's ashes after this happens.</p> <p>The Hospital can dispose of my baby's remains by cremation if I do not contact the Hospital of the University of Pennsylvania morgue at 215-662-3214 by the date above.</p>

Please let your nurse know if you need help with planning for the fetus/baby's remains. The nurses and the staff in Pastoral Care Department will help you.

SIGNATURES

	Mother	7/17/15
	Relationship to baby	Date and Time
		7/17/15
Witness	Title	Date and Time

DISCHARGE INSTRUCTIONS**Penn Medicine**

Hospital of the University of Pennsylvania

Patient Name: SHUJAA, KENYA**Admit Date: 9/17/2015 3:45:00 AM****MRN/Visit#: 16772907 / 134381699****Discharge Date: 9/17/2015 4:28:48 PM****Birth Date: 7/23/1973****Important Discharge Instructions****Reason for Visit:**

Preterm labor

Diet:

A heart healthy diet is low in animal fat. Do not eat foods like bacon, sausage, whole milk, butter and fried foods. Instead eat foods that are baked, grilled or broiled. Eat fresh vegetables, whole grains, beans and fish.

Eat healthy foods to decrease the risk of stroke, heart disease and other health problems. For a healthy diet, eat a wide variety of foods. Choose lean meats and fish. Eat fresh fruits and vegetables. Avoid fried foods. Choose foods that are low in sodium (low salt), sugar and fat.

Activity:

"Pelvic Rest" for 6 weeks: This means nothing in the vagina (no intercourse, tampons, douching, etc.) and no tub baths or swimming for the next 6 weeks.

You may have irregular bleeding for several weeks following your delivery. This is normal. If you have heavy bleeding such that you are soaking 1 pad in an hour for 2 hours, you should call your doctor or come to the Emergency Room.

If you have a fever of 100.4 or greater you should call your doctor or return to the Emergency Room.

It is normal to feel emotional and teary following delivery. If you experience the blues that last for more than two weeks or feel like you want to hurt yourself, or someone else, please call your doctor, go to the nearest emergency room or call the Psychiatry Emergency and Evaluation Center (PEEC) at 215 662 2121. The PEEC is located on the ground floor of the Ravdin building and is open 24 hours a day, 7 days a week.

You should take it easy for 2 weeks. Only up/down stairs 1-2 times daily. No heavy lifting (heavier than the or a gallon of milk).

Once you are feeling better, make a plan to exercise. Discuss the plan with your doctor. The risk for heart disease and stroke goes down when you are active and normal weight.

Information About Your Hospital Stay**Attending Physician:**

Your main doctor in the hospital was: Dr. Kyra Williams

Health Issues Addressed during the Hospital Visit:

Status post vaginal delivery

Procedures:

Spontaneous vaginal delivery after admission for preterm labor

Exhibit F

DISCHARGE INSTRUCTIONS**Penn Medicine**

Hospital of the University of Pennsylvania

Patient Name: SHUJAA, KENYA**Admit Date: 9/17/2015 3:45:00 AM****MRN/Visit#: 16772907 / 134381699****Discharge Date: 9/17/2015 4:28:48 PM****Birth Date: 7/23/1973****Pending Test Results:****Request Date Name**

17 Sep 2015 03:58:00 R/O Gonorrhea & Chlamydia DNA Assay

17 Sep 2015 03:58:47 RPR (Maternal)

17 Sep 2015 05:09:20 Blood Fetal Hemoglobin

17 Sep 2015 05:09:20 Beta-2-Microglobulin (Serum)

17 Sep 2015 05:09:20 Anticardiolipin Antibody

17 Sep 2015 09:10:00 Dilute Russel Viper Venom Time

17 Sep 2015 09:10:00 Beta 2 Glycoprotein 1

Medicines**Allergies:**

No Known Allergies

Your Medicines and When to Take Them:

Medication	Instruction
Colace 100 mg oral capsule	1 cap(s) orally 2 times a day
	Medication should be taken with plenty of water.
Feosol 325 mg (65 mg elemental iron) oral tablet	1 cap(s) orally 2 times a day
	Check with your doctor before becoming pregnant. Do not chew, break, or crush. May discolor urine or feces.
ibuprofen 600 mg oral tablet	1 tab(s) orally every 6 hours as needed for pain
	It is very important that you take or use this exactly as directed. Do not skip doses or discontinue unless directed by your doctor. May cause drowsiness or dizziness. Obtain medical advice before taking any non-prescription drugs as some may affect the action of this medication. Take with food or milk.
Prenatal Multivitamins with Folic Acid 0.4 mg oral tablet	1 cap(s) orally once a day
	May discolor urine or feces. Take with food or milk.

Information about Your Medicines:

Take each medication as prescribed by your doctor. Keep a current list of your medication. If you have questions about your medications, ask your doctor or nurse.

Care After You Leave The Hospital

Exhibit F

DISCHARGE INSTRUCTIONS



Penn Medicine

Hospital of the University of Pennsylvania

Patient Name: SHUJAA, KENYA

Admit Date: 9/17/2015 3:45:00 AM

MRN/Visit#: 16772907 / 134381699

Discharge Date: 9/17/2015 4:28:48 PM

Birth Date: 7/23/1973

Future Doctors Appointments:

Please follow up at the Helen O Dickens Center in 2 weeks for an appointment. You should receive a call from Dena Baker regarding this appointment, if you have not heard from her within a week, please call (215) 662-2730 to make an appointment or if you have any questions. The center is located on the first floor of the Gates Pavilion.

Also, for your records, your blood type is O POSITIVE.

Follow up with primary or heart doctor upon discharge and keep all return appointments with your doctor.

Contact Your Doctor:

You were under the care of Obstetrics & Gynecology. Please call this doctor's office if you have any questions regarding your hospitalization or discharge instructions. If you need assistance locating your doctor's phone number, please call the hospital operator at 215-662-4000.

Please call your doctor if you have any of the following symptoms:

- Chest pain
- Shortness of breath
- Pain unrelieved with prescribed medicine
- Redness, swelling or pus-like drainage from incision/wound
- Unable to urinate
- Nausea/vomiting
- Diarrhea
- Constipation
- Fever greater than 100.4

When to Call 911:

Call 911 if you have a medical emergency or if you have any of the following sudden signs and symptoms of stroke:

- Weakness or numbness on one side of the body
- Drooping of the face on one side
- Not able to talk or understand others' speech
- Suddenly cannot see
- Bad headache for no reason

DISCHARGE INSTRUCTIONS**Penn Medicine**

Hospital of the University of Pennsylvania

Patient Name: SHUJAA, KENYA**Admit Date: 9/17/2015 3:45:00 AM****MRN/Visit#: 16772907 / 134381699****Discharge Date: 9/17/2015 4:28:48 PM****Birth Date: 7/23/1973****Information for Patients with Heart Failure:**

Weigh yourself at the same time each day. Write your weight down to remember it. Talk to your doctor about your usual weight. Call your doctor if you go over your weight by more than 2 pounds in 2 days or 4 pounds in a week.

Call your doctor if you have:

Chest pain, pressure, or tightness

Problems breathing when resting or lying down

Constant cough

Weight gain of 2 pounds over 2 days

Feel faint or dizzy, or falling

Smoking Information:

If you are a current smoker or have smoked in the past 12 months, the most important things you should do to live better and longer are to stop smoking and avoid being around other people while they smoke. PLEASE call: 1-800-QUIT-NOW (1-800-784-8669) or go online to <http://www.smokefree.gov/> for help.

Access Your Personal Records:

You can now access an electronic copy of your hospital discharge instructions on a mobile device or computer. If you have an outpatient doctor at Penn, you can also view test results, request appointments, referrals and prescription renewals. Visit myPennMedicine.org, click on "Request an Activation Code" and follow the instructions provided.

Completed By:

Lee, Daniel D (MD) [Sep 17 2015 12:12PM]



EXHIBIT G

Patient Name: SHUJAA, KENYA

HUP/William Pepper S2K 011177
3400 Spruce Street
Philadelphia PA 19104

Date of Birth: 23-Jul-73
Gender: Female
ARUP ID: 1ARUP0001190374
Requisition #: PREQ00001141892
Client Supplied ID: 16772907; 15-260-09117
Physician: 1824531 -edllson,
Printed: 30-Sep-15 14:16:04

Procedure	Result	Units	Ref Interval	Accession	Collected	Received	Verified
SNP Microarray, Products of Conception	Abnormal *f		[Normal]	15-261-402916	17-Sep-15	19-Sep-15	30-Sep-15
EER SNP Microarray, Products of Concept	EER Unavailable			15-261-402916	07:00:00	10:08:00	10:40:34

17-Sep-15 07:00:00 SNP Microarray, Products of Conception:

Specimen Received
Specimen Type: Products of Conception (Villi)
Reason for Referral: Stillbirth
Test Performed: ARRAY POC

ABNORMAL MICROARRAY RESULT

Copy number change: 18pterqter gain
Base pair coordinates: 136,226-78,014,123 (hg build 19)
Approximate Size: 77.9 Mb

Copy number change: 16p13.11 gain (Clinical significance for pregnancy loss is uncertain, see interpretation below)
Base pair coordinates: 15,481,747-16,516,109 (hg build 19)
Approximate Size: 1.0 Mb

Sex chromosome complement: XX (female)

Genetic results:
ISCN: arr[hg19] 16p13.11(15,481,747-16,516,109)x3,18p11.32q23(136,226-78,014,123)x3

The cytogenomic microarray analysis indicated that there was a gain involving chromosome 18 (77.9 Mb duplicated) from 18pter to 18qter, suggesting trisomy for chromosome 18.

Autosomal trisomy is the most frequent type of chromosomal abnormality in pregnancy loss and is usually sporadic.

In addition, the cytogenomic microarray analysis showed an interstitial gain involving chromosome 16 (1.0 Mb duplicated) within 16p13.11, indicating trisomy for this region. This duplication involves 17 genes: MFV17L, C16orf45, KIAA0430, NDE1, MIR484, MYH11, FOPNL, ABCC1, ABCC6, NMO3, MIR3179-1, MIR3179-3, MIR3179-2, MIR3180-1, MIR3180-3, MIR3180-2, PKD1P1.

This is a duplication of the recurrent 16p13.11 (NDE1/MYH11) copy number variable (CNV) region. The duplicated region includes two adjacent low-copy repeat (LCR)-flanked regions (sometimes referred to as Intervals I and II in the literature). Note that the reported size of this duplication may vary from patient to patient due to flanking segmental duplication architecture.

The 16p13.11 duplication has been reported in association with a variety of clinical findings, including developmental delay/intellectual disability, psychiatric/behavioral problems (whether there is a specific association to Tourette's disorder is uncertain), speech delay, dysmorphic features, motor delay, ADHD, congenital anomalies (most commonly involving the heart), autism, seizures and obesity. 16p13.11 duplications have also been identified in studies of control populations and in parents who are mildly affected or unaffected, indicating that the phenotype associated with this CNV is incompletely penetrant and shows variable expressivity. One hypothesized explanation for this phenotypic variability is that the developmental pathways

* = Abnormal, # = Corrected, C = Critical, f = Footnote, H = High, L = Low, t = Interpretive Text, @ = Reference Lab

Patient Name: SHUJAA, KENYA

Chart ID: 11218974
Page 1 of 4

ARUP Laboratories 500 Chipeta Way SLC, UT 84108 - (800)522-2787 - www.aruplab.com - Jerry W. Hussong, MD - Director of Laboratories



Exhibit G

Patient Name: SHUJAA, KENYA

HUP/William Pepper S2K 011177
3400 Spruce Street
Philadelphia PA 19104

Date of Birth: 23-Jul-73
Gender: Female
ARUP ID: 1ARUP0001190374
Requisition #: PREQ00001141892
Client Supplied ID: 16772907 ; 15-260-09117
Physician: 1824531 -edllson,
Printed: 30-Sep-15 14:16:04

affected by 16p13.11 genes may require a second hit for expression of 16p13.11 associated features. Although undefined, this second hit may be another CNV, a sequence-level alteration, or involve environmental, epigenetic, or stochastic factors (Girirajan et al. 2012). Thus, in the absence of associated clinical findings, 16p13.11 duplication may represent a predisposing or susceptibility risk factor for expression of these features.

* = Abnormal, # = Corrected, C = Critical, f = Footnote, H = High, L = Low, t = Interpretive Text, @ = Reference Lab

Patient Name: SHUJAA, KENYA

Chart ID: 11218974

Page 2 of 4

ARUP Laboratories 500 Chipeta Way SLC, UT 84108 - (800)522-2787 - www.aruplab.com - Jerry W. Hnsson, MD - Director of Laboratories

Patient Name: SHUJAA, KENYA

HUP/William Pepper S2K 011177
3400 Spruce Street
Philadelphia PA 19104

Date of Birth: 23-Jul-73
Gender: Female
ARUP ID: 1ARUP0001190374
Requisition #: PREQ00001141892
Client Supplied ID: 16772907; 15-260-09117
Physician: 1824531 -edllson,
Printed: 30-Sep-15 14:16:04

The exact risk for expression for 16p13.11 duplication-associated features is not currently known. Estimates of penetrance, and thus for an abnormal phenotype with any level of expression, were recently published for several of the CNV regions with highly variable phenotypes (Rosenfeld et al. 2013). The penetrance for the reciprocal 16p13.11 deletion were estimated to be 13.1% (7.9-21.3, 95 percent confidence interval); this includes both males and females. The overall penetrance for the duplication is expected to be lower than for the deletion; however, the penetrance in a male may be higher than for a female based on the study by Tropeano et al. (2013). Also, any estimate of penetrance does not define the risk for a specific phenotype, but includes all levels of expression that have been observed for a specific duplication or deletion.

Please note that it is currently unknown whether 16p13.11 duplication is over-represented in cases of pregnancy loss. Therefore, the association between this finding and pregnancy loss is unknown.

Both de novo and inherited duplications of 16p13.11 have been detected. Over 80 per cent of CNVs (deletions and duplications) were inherited from a parent in the study by Tropeano et al. (2013). As familial duplications may be inherited from a normal or mildly affected parent, parental studies to determine the inheritance of this CNV would not be useful for predicting the clinical significance of the duplication in this patient, but may be considered for reproductive counseling.

References:

- 1) Cooper GM et al. 2011. A copy number variation morbidity map of developmental delay. Nat Genet. 43:838-46.
- 2) Girirajan et al. 2012. Phenotypic heterogeneity of genomic disorders and rare copy-number variants. N Engl J Med. 367(14):1321-31.
- 3) Hannes FD et al. 2009. Recurrent reciprocal deletions and duplications of 16p13.11: The deletion is a risk factor for MR/MCA while the duplication may be a rare benign variant. J Med Genet. 46:223-32.
- 4) Ingason et al. 2011. Copy number variations of chromosome 16p13.1 region associated with schizophrenia. Mol Psychiatry. 16(1):17-25.
- 5) Kuang et al. 2011. Recurrent chromosome 16p13.1 duplications are a risk factor for aortic dissections. PLoS Genet. Jun;7(6):e1002118.
- 6) Mefford HC et al. 2009. A method for rapid, targeted CNV genotyping identifies rare variants associated with neurocognitive disease. Genome Res. 19:1579-85.
- 7) Magri et al. 2010. New copy number variations in schizophrenia. PLoS One. 2010 Oct 13;5(10):e13422.
- 8) Nagamani et al. 2011. Phenotypic manifestations of copy number variation in chromosome 16p13.11. Eur J Hum Genet. 19(3):280-6.
- 9) Ramalingam et al. 2011. 16p13.11 duplication is a risk factor for a wide spectrum of neuropsychiatric disorders. J Hum Genet. 56(7):541-4.
- 10) Tropeano et al. 2013. Male-biased autosomal effect of 16p13.11 copy number variation in neurodevelopmental disorders. PLoS One. 2013 Apr 18;8(4):e61365.
- 11) Vassos et al. 2010. Penetrance for copy number variants associated with schizophrenia. Hum Mol Genet. 19(17):3477-81.
- 12) Ullmann et al. 2007. Array CGH identifies reciprocal 16p13.1 duplications and deletions that predispose to autism and/or mental retardation. Hum Mutat. 28:674-82.
- 13) Williams et al. 2010. Rare chromosomal deletions and duplications in attention-deficit hyperactivity disorder: a genome-wide analysis. Lancet. 376:1401-8.

Recommendations:

1. Genetic counseling
2. Parental studies for the 16p13.11 duplication may be considered for reproductive counseling

Certain copy number variants (CNV) have been observed in many individuals with no phenotypic associations and are believed to be clinically insignificant. Any such CNVs which have been detected in this patient are thus not specifically listed in this report.

* = Abnormal, # = Corrected, C = Critical, f = Footnote, H = High, L = Low, t = Interpretive Text, @ = Reference Lab

Patient Name: SHUJAA, KENYA

Chart ID: 11218974
Page 3 of 4

ARUP Laboratories 500 Chipeta Way SLC, UT 84108 - (800)522-2787 - www.aruplab.com - Jerry W. Hassong, MD - Director of Laboratories



Exhibit G

Patient Name: SHUJAA, KENYA

HUP/William Pepper S2K 011177
3400 Spruce Street
Philadelphia PA 19104

Date of Birth: 23-Jul-73
Gender: Female
ARUP ID: 1ARUP0001190374
Requisition #: PREQ00001141892
Client Supplied ID: 16772907; 15-260-09117
Physician: 1824531 -edilson,
Printed: 30-Sep-15 14:16:04

If you would like additional information, please contact an ARUP genetic counselor at (800) 242-2787 extension 2141. ARUP genetic counselors are available to help health care providers with test selection, result interpretation and identifying local clinical genetic services.

Chromosomal Microarray Analysis (CMA) Methodology

This CMA was performed using Affymetrix Cytoscan HD Array. The array offers a total of 2,696,550 markers across the entire genome, including 1,953,246 unique non-polymorphic markers, and 743,304 SNP markers. This technique will detect imbalances that are relatively small by cytogenetic standards. Patient hybridization parameters are compared to data derived from 100 individuals with normal microarray results. Gains and losses are reported based on genomic content. Duplications smaller than 400 kb and deletions smaller than 50 kb may not be investigated. Long continuous stretches of homozygosity (LCSH) may indicate either a uniparental disomy (UPD) if it occurs within a chromosome or regions identical by descent (IBD) if it occurs across numerous independent regions. Haplotype structure within populations allows for normal stretches of homozygosity, usually under 8 to 10 Mb in size. Therefore, a size filter for a LCSH is important to distinguish between normal homozygosity for a region versus homozygosity due to potential UPD or IBD. LCSH on imprinted chromosomes (6, 7, 11, 14 and 15) less than 8 Mb (telomeric) or 10 Mb (interstitial) may not be investigated or reported. LCSH less than 10 Mb (telomeric) or 15 Mb (interstitial) on non-imprinted chromosomes may also not be investigated or reported. Homozygosity of approximately 3 percent of the genome or greater may be reported as it suggests an increased risk for a recessive condition.

This microarray and associated software (Chromosome Analysis Suite) are manufactured by Affymetrix and used by ARUP Laboratories for the purpose of identifying DNA copy number gains and losses associated with the large chromosomal imbalances and long continuous stretches of homozygosity. It will not detect balanced rearrangements, such as translocations, inversions and balanced insertions. Although triploidy can be detected due to the associated allelic imbalance, tetraploidy is not detectable by this method. Additionally base pair mutations, genomic imbalances below the resolution of this array platform, and aberrations in regions of the genome not represented on the array platform will not be detected. Low-level mosaicism (<25 percent) may also be undetectable, and in some cases, mosaicism will result in discrepancies between the karyotype and microarray analysis. The failure to detect an alteration at any locus does not exclude the diagnosis of any of the disorders represented on the microarray. While ARUP Laboratories and other clinical laboratories per American College of Medical Genetics (ACMG) guidelines have extensively validated this assay, it is not feasible to validate every potential genomic imbalance in the human genome. Furthermore, this technique only identifies the regions of imbalance; it does not provide information regarding rearrangement mechanisms.

This result has been reviewed and approved by Xinjie Xu, PhD, FACMG
Electronic Signature

17-Sep-15 07:00:00 SNP Microarray, Products of Conception
INTERPRETIVE DATA: SNP Microarray, Products of Conception

Counseling and informed consent are recommended for genetic testing. Consent forms are available online at www.aruplab.com.

Test developed and characteristics determined by ARUP Laboratories. See Compliance Statement C: aruplab.com/CS

* = Abnormal, # = Corrected, C = Critical, f = Footnote, H = High, L = Low, t = Interpretive Text, @ = Reference Lab

Patient Name: SHUJAA, KENYA

Chart ID: 11218974
Page 4 of 4

ARUP Laboratories 500 Chipeta Way SLC, UT 84108 - (800)522-2787 - www.aruplab.com - Jerry W. Hassong, MD - Director of Laboratories

MR #: 016772907 HUP/HUP
Shujaa, Kenya

DSCH

42 Y F 23JUL73

Exhibit G...



#016772907#



PT #: 134381699

17SEP15 1722 (18:30)

TIME: _____

INIT: _____



PLCN #: 15-260-09117

10.00mL Steril C (R) RT/RT
Refrigerate
GENOSNP

DR. Srinivas, Sindhu K M

incident/complaint

3 messages

DARUS HUNTER <darus@sas.upenn.edu>

Sun, Sep 20, 2015 at 1:13 PM

To: r.william.michael@phila.gov, joseph.chaffin@phila.gov

Hi Mr. Michael,

I met with you on 09/18/2015 in your office. I am copying your colleague in this email. This was a description of the incident which I described to you on 09/18.

Darus Leon Hunter

1242 South 51st street, Philadelphia PA 19143

(215) 303-8787 [cell], (215) 727-1508 [home]

I was in my home on 09/16/2015 at approximately 11:59 pm, when I heard a load banging on my front door. I got out of bed and walked into the living room. I noticed that my son had opened the front door and two police officers were standing in the doorway. As they began to proceed into my home, I walked over and stood in their way and asked what they wanted. They asked where Khadira (my 7 year-old-daughter) was. As I escorted the officers to my front porch, I explained that she was in bed asleep. One of the police officers told me to get her up. He said that her mother (Cinquette Muhammad) had come into the station, complaining that our daughter was not home on time. After I woke her up I asked what he wanted me to do. While we were speaking, my girlfriend retrieved a copy of our existing custody order. I explained to the officer that all district schools were closed the following day and that she was spending the night. I displayed the messages from the week before which demonstrated that we had followed the same plan when school was off for labor day. The officer looked at the documents and he and his partner left. I called the 12th district and stated that I wished to file a complaint against the (2) officers for attempting to walk into my home and shining their flashlights into my children's faces. I was told that I needed to call 911 in order to file a complaint. I called 911 and stated that I wanted to file a complaint against the officers. The 911 operator told me that I needed to call the police district where the incident occurred. I called the 12th district again and asked for a supervisor. My call was referred to a Sgt. Melner. He told me that I needed to dial 911 in order to file a complaint against the officers and that he didn't have their names. At approximately 1:00 am, the officers Naveedo and Schute returned to my home. They were again banging on my door very loudly and violently. My girlfriend Kenya J Shujaa began opening the door when one of the officers forcefully pushed the door into her belly, knocking her backward. I asked the officer "what the hell he was doing?" He told me to calm down and warned me not to get myself "locked-up". He stated "Oh you want to file a complaint against me, right?" I just said that I wanted him to leave me alone. He again shined his flashlight into my home. He and his partner left again. I called the 12th district again and was referred to Sgt. Melner who again told me that I needed to call 911 in order to file a complaint. The officers returned to my home for a third time at approximately 1:30 am and banged on and kicked my door. I opened the door and asked what the officers wanted. The officer asked if I had a problem with him. I said that it was over and I just wanted to go to bed. The officers again left. I called 911 again and asked for a supervisor. The call was transferred to a Sgt. Hameen police radio #358. I told him what Sgt. Melner had stated and he (Sgt. Hameen) said that Sgt. Melner was lying if he claimed to not have the officers' names. I called back to the 12th district and asked for a supervisor and was again transferred to Sgt. Melner, who again told me that I needed to call 911 in order to file a complaint. I informed him of my conversation with Sgt. Hameen and that he had given me his police radio number. Sgt. Melner then informed me that the officers names were Naveedo and Schute. I returned to bed. The following day, my daughter Khadira asked why the police were in my home. I told her that the police had made a mistake in coming to our house. On 09/14/2015, my girlfriend Kenya J. Shujaa, who was 18 1/2 weeks pregnant at that time, noticed a slight clear discharge of fluid on her leg. She continued to notice this for the next

Exhibit H

couple of days. We did not think this was anything serious. On 09/16/2015, Kenya began feeling very painful cramps. We called 911 and she was transported by paramedic to Mercy Hospital. She was then transported to HUP (Hospital at the University of Pennsylvania) where she was transported to labor and delivery. She experienced a miscarriage. The doctors informed us that our baby was developing healthily and normally. Her amniotic sac lost too much fluid to support our developing baby. Our baby died as a result. I believe the loss of fluid was the direct result of the blunt force trauma experienced when the officer forcefully pushed my front door into my girlfriend's belly during his second visit to our home on this night.

Darus Hunter Sr.

Joseph Chaffin <Joseph.Chaffin@phila.gov>
To: DARUS HUNTER <darus@sas.upenn.edu>
Cc: R William Michael <R.William.Michael@phila.gov>

Mon, Sep 21, 2015 at 3:52 PM

I am so sorry for your loss. Mr. Hunter. We will follow through with your complaint. If you have and further questions or need a status on this complaint it is best for you to contact Mr. Michael since he will be handling your complaint. However if you cannot reach him I will be glad to assist you to the extent I can.

From: DARUS HUNTER [mailto:darus@sas.upenn.edu]
Sent: Sunday, September 20, 2015 1:13 PM
To: R William Michael; Joseph Chaffin
Subject: Incident/complaint

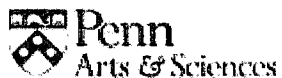
[Quoted text hidden]

DARUS HUNTER <darus@sas.upenn.edu>
To: DARUS HUNTER <darus@sas.upenn.edu>

Wed, Sep 21, 2016 at 1:32 PM

[Quoted text hidden]

Exhibit H



DARUS HUNTER <darus@sas.upenn.edu>

RE: Official Police Misconduct Complaint: W-IAD-3976

DARUS HUNTER <darus@sas.upenn.edu>

Mon, Dec 14, 2015 at 10:11 AM

To: joseph.chaffin@phila.gov, JOSEPH.MCGARREY@phila.gov, r.william.michael@phila.gov

Dear Internal Affairs and Police Advisory Commission,
Please read the attached document which references the event on 09/16/2015 at the Hunter household.

Sincerely,
Darus Hunter Sr. (on behalf of Hunter household)
[Quoted text hidden]

 **Darus Hunter Sr.pdf**
98K

police incident

1 message

DARUS HUNTER <darus@sas.upenn.edu>

Wed, Oct 21, 2015 at 6:49 PM

To: usapae.usattorney@usdoj.gov

Dear US Attorney,

I sent this message to internal affairs division and they are investigating.

I was in my home on 09/16/2015 at approximately 11:59 pm, when I heard a loud banging on my front door. I got out of bed and walked into the living room. I noticed that my son had opened the front door and two police officers were standing in the doorway. As they began to proceed into my home, I walked over and stood in their way and asked what they wanted. They asked where Khadira (my 7 year-old-daughter) was. As I escorted the officers to my front porch, I explained that she was in bed asleep. One of the police officers told me to get her up. He said that her mother (Cinquetta Muhammad) had come into the station, complaining that our daughter was not home on time. After I woke her up I asked what he wanted me to do. While we were speaking, my girlfriend retrieved a copy of our existing custody order. I explained to the officer that all district schools were closed the following day and that she was spending the night. I displayed the messages from the week before which demonstrated that we had followed the same plan when school was off for labor day. The officer looked at the documents and he and his partner left. I called the 12th district and stated that I wished to file a complaint against the (2) officers for attempting to walk into my home and shining their flashlights into my children's faces. I was told that I needed to call 911 in order to file a complaint. I called 911 and stated that I wanted to file a complaint against the officers. The 911 operator told me that I needed to call the police district where the incident occurred. I called the 12th district again and asked for a supervisor. My call was referred to a Sgt. Melner. He told me that I needed to dial 911 in order to file a complaint against the officers and that he didn't have their names. At approximately 1:00 am, the officers Naveedo and Schute returned to my home. They were again banging on my door very loudly and violently. My girlfriend Kenya J Shujaa began opening the door when one of the officers forcefully pushed the door into her belly, knocking her backward. I asked the officer "what the hell he was doing?" He told me to calm down and warned me not to get myself "locked-up". He stated "Oh you want to file a complaint against me, right?" I just said that I wanted him to leave me alone. He again shined his flashlight into my home. He and his partner left again. I called the 12th district again and was referred to Sgt. Melner who again told me that I needed to call 911 in order to file a complaint. The officers returned to my home for a third time at approximately 1:30 am and banged on and kicked my door. I opened the door and asked what the officers wanted. The officer asked if I had a problem with him. I said that it was over and I just wanted to go to bed. The officers again left. I called 911 again and asked for a supervisor. The call was transferred to a Sgt. Hameen police radio #358. I told him what Sgt. Melner had stated and he (Sgt. Hameen) said that Sgt. Melner was lying if he claimed to not have the officers' names. I called back to the 12th district and asked for a supervisor and was again transferred to Sgt. Melner, who again told me that I needed to call 911 in order to file a complaint. I informed him of my conversation with Sgt. Hameen and that he had given me his police radio number. Sgt. Melner then informed me that the officers names were Naveedo and Schute. I returned to bed. The following day, my daughter Khadira asked why the police were in my home. I told her that the police had made a mistake in coming to our house. On 09/14/2015, my girlfriend Kenya J. Shujaa, who was 18 1/2 weeks pregnant at that time, noticed a slight clear discharge of fluid on her leg. She continued to notice this for the next couple of days. We did not think this was anything serious. On 09/16/2015, Kenya began feeling very painful cramps. We called 911 and she was transported by paramedic to Mercy Hospital. She was then transported to HUP (Hospital at the University of Pennsylvania) where she was transported to labor and delivery. She experienced a miscarriage. The doctors informed us that our baby was developing healthily and normally. Her amniotic sac lost too much fluid to support our developing baby. Our baby died as a result. I believe the loss of fluid was the direct result of the blunt force trauma experienced when the officer forcefully pushed my front door into my girlfriend's belly during his second visit to our home on this night.

Sincerely,

Darus Leon Hunter

Exhibit I

Exhibit J

From: DARUS HUNTER [darus@sas.upenn.edu]
Sent: Wednesday, October 21, 2015 6:24 PM
To: Joseph Mcgarrey; Joseph Chaffin; R William Michael
Subject: INCIDENT

Hello Lieutenant McGarrey,

It has been a couple of weeks since you visited my home to investigate the incident involving officers Naveedo and Schute. When can I expect these officers to be charged criminally for the events that led to my wife Kenya Shujaa, miscarrying our baby? The officers had not received an assignment which required their presence at my home on the second and third visits that night. They were originally contacted by Cinquetta Muhammad at the 12th district, with her stating that my daughter was not home on time. The (2) officers came to my home, banged on the front door and shined flashlights inside and eventually left. After their initial visit, there was no practical reason for the officers to return to my home for a second or third time. Their actions violated both state and federal laws. Do you intend to allow their actions to go without the officers being criminally charged? Aren't they subject to the laws of the Pennsylvania criminal code as is everyone else? It was obvious that their supervisor Sgt. Melner went to some effort to obscure the names of the officers when I asked for them. I called Sgt. Hameen via 911 [recorded line] and was given his police radio number and badge number as verification of his truthfulness. It appears as if the safety and sanctity of my family are not important and that police officers can break the laws and violate the rights of "others" whenever they choose to. By doing nothing, you communicate the message that police officers are not subject to prosecution when they break the laws and harm good citizens. This is the United States of America and the rights of my family are as important and unalienable as anyone else. The police officers who terrorized us and assaulted my wife should be charged as the criminals they are.

Darus Hunter Sr.

R William Michael <R.William.Michael@phila.gov>
To: DARUS HUNTER <darus@sas.upenn.edu>
Cc: Kelvyn Anderson <Kelvyn.Anderson@phila.gov>

Thu, Oct 22, 2015 at 12:14 PM

The investigation into your complaint is being conducted as we speak. It is our intention to interview all the officers involved and attain all the facts regarding this matter, your patience is indeed appreciated.

From: DARUS HUNTER [darus@sas.upenn.edu]
Sent: Wednesday, October 21, 2015 6:24 PM
To: Joseph Mcgarrey; Joseph Chaffin; R William Michael
Subject: INCIDENT

Hello Lieutenant McGarrey,

It has been a couple of weeks since you visited my home to investigate the incident involving officers Naveedo and Schute. When can I expect these officers to be charged criminally for the events that led to my wife Kenya Shujaa, miscarrying our baby? The officers had not received an assignment which required their presence at my home on the second and third visits that night. They

Exhibit J

were originally contacted by Cinquetta Muhammad at the 12th district, with her stating that my daughter was not home on time. The (2) officers came to my home, banged on the front door and shined flashlights inside and eventually left. After their initial visit, there was no practical reason for the officers to return to my home for a second or third time. Their actions violated both state and federal laws. Do you intend to allow their actions to go without the officers being criminally charged? Aren't they subject to the laws of the Pennsylvania criminal code as is everyone else? It was obvious that their supervisor Sgt. Melner went to some effort to obscure the names of the officers when I asked for them. I called Sgt. Hameen via 911 [recorded line] and was given his police radio number and badge number as verification of his truthfulness. It appears as if the safety and sanctity of my family are not important and that police officers can break the laws and violate the rights of "others" whenever they choose to. By doing nothing, you communicate the message that police officers are not subject to prosecution when they break the laws and harm good citizens. This is the United States of America and the rights of my family are as important and unalienable as anyone else. The police officers who terrorized us and assaulted my wife should be charged as the criminals they are.

Darus Hunter Sr.

INCIDENT

3 messages

DARUS HUNTER <darus@sas.upenn.edu>

Wed, Oct 21, 2015 at 6:24 PM

To: JOSEPH.MCGARREY@phila.gov, Joseph.chaffin@phila.gov, r.william.michael@phila.gov

Hello Lieutenant McGarrey,

It has been a couple of weeks since you visited my home to investigate the incident involving officers Naveedo and Schute. When can I expect these officers to be charged criminally for the events that led to my wife Kenya Shujaa, miscarrying our baby? The officers had not received an assignment which required their presence at my home on the second and third visits that night. They were originally contacted by Cinquetta Muhammad at the 12th district, with her stating that my daughter was not home on time. The (2) officers came to my home, banged on the front door and shined flashlights inside and eventually left. After their initial visit, there was no practical reason for the officers to return to my home for a second or third time. Their actions violated both state and federal laws. Do you intend to allow their actions to go without the officers being criminally charged? Aren't they subject to the laws of the Pennsylvania criminal code as is everyone else? It was obvious that their supervisor Sgt. Melner went to some effort to obscure the names of the officers when I asked for them. I called Sgt. Hameen via 911 [recorded line] and was given his police radio number and badge number as verification of his truthfulness. It appears as if the safety and sanctity of my family are not important and that police officers can break the laws and violate the rights of "others" whenever they choose to. By doing nothing, you communicate the message that police officers are not subject to prosecution when they break the laws and harm good citizens. This is the United States of America and the rights of my family are as important and unalienable as anyone else. The police officers who terrorized us and assaulted my wife should be charged as the criminals they are.

Darus Hunter Sr.

Joseph McGarrey <Joseph.Mcgarrey@phila.gov>

Thu, Oct 22, 2015 at 8:39 AM

To: DARUS HUNTER <darus@sas.upenn.edu>

Mr. Hunter,

The investigation is ongoing and you will be notified when it has been completed.

Joseph McGarrey

Lieutenant 451

Philadelphia Police Department

Internal Affairs Division

Exhibit K

support our developing baby. Our baby died as a result. I believe the loss of fluid was the direct result of the blunt force trauma experienced when the officer forcefully pushed my front door into my girlfriend's belly during his second visit to our home on this night.

Darus Hunter Sr.

DA_Northwest <DA_Northwest@phila.gov>
To: DARUS HUNTER <darus@sas.upenn.edu>

Fri, Nov 13, 2015 at 12:40 PM

Per our Asst. Chief, please contact Internal Affairs.

Thank you.

From: DARUS HUNTER [darus@sas.upenn.edu]
Sent: Sunday, September 20, 2015 12:53 PM
To: DA_Northwest
Subject: complaint/incident

[Quoted text hidden]

complaint/incident

2 messages

DARUS HUNTER <darus@sas.upenn.edu>

Sun, Sep 20, 2015 at 12:53 PM

To: DA_Northwest@phila.gov

Darus Leon Hunter

1242 South 51st street, Philadelphia PA 19143

(215) 303-8787 [cell], (215) 727-1508 [home]

I was in my home on 09/16/2015 at approximately 11:59 pm, when I heard a load banging on my front door. I got out of bed and walked into the living room. I noticed that my son had opened the front door and two police officers were standing in the doorway. As they began to proceed into my home, I walked over and stood in their way and asked what they wanted. They asked where Khadira (my 7 year-old-daughter) was. As I escorted the officers to my front porch, I explained that she was in bed asleep. One of the police officers told me to get her up. He said that her mother (Cinquette Muhammad) had come into the station, complaining that our daughter was not home on time. After I woke her up I asked what he wanted me to do. While we were speaking, my girlfriend retrieved a copy of our existing custody order. I explained to the officer that all district schools were closed the following day and that she was spending the night. I displayed the messages from the week before which demonstrated that we had followed the same plan when school was off for labor day. The officer looked at the documents and he and his partner left. I called the 12th district and stated that I wished to file a complaint against the (2) officers for attempting to walk into my home and shining their flashlights into my children's faces. I was told that I needed to call 911 in order to file a complaint. I called 911 and stated that I wanted to file a complaint against the officers. The 911 operator told me that I needed to call the police district where the incident occurred. I called the 12th district again and asked for a supervisor. My call was referred to a Sgt. Melner. He told me that I needed to dial 911 in order to file a complaint against the officers and that he didn't have their names. At approximately 1:00 am, the officers Naveedo and Schute returned to my home. They were again banging on my door very loudly and violently. My girlfriend Kenya J Shujaa began opening the door when one of the officers forcefully pushed the door into her belly, knocking her backward. I asked the officer "what the hell he was doing?" He told me to calm down and warned me not to get myself "locked-up". He stated "Oh you want to file a complaint against me, right?" I just said that I wanted him to leave me alone. He again shined his flashlight into my home. He and his partner left again. I called the 12th district again and was referred to Sgt. Melner who again told me that I needed to call 911 in order to file a complaint. The officers returned to my home for a third time at approximately 1:30 am and banged on and kicked my door. I opened the door and asked what the officers wanted. The officer asked if I had a problem with him. I said that it was over and I just wanted to go to bed. The officers again left. I called 911 again and asked for a supervisor. The call was transferred to a Sgt. Hameen police radio #358. I told him what Sgt. Melner had stated and he (Sgt. Hameen) said that Sgt. Melner was lying if he claimed to not have the officers' names. I called back to the 12th district and asked for a supervisor and was again transferred to Sgt. Melner, who again told me that I needed to call 911 in order to file a complaint. I informed him of my conversation with Sgt. Hameen and that he had given me his police radio number. Sgt. Melner then informed me that the officers names were Naveedo and Schute. I returned to bed. The following day, my daughter Khadira asked why the police were in my home. I told her that the police had made a mistake in coming to our house. On 09/14/2015, my girlfriend Kenya J. Shujaa, who was 18 1/2 weeks pregnant at that time, noticed a slight clear discharge of fluid on her leg. She continued to notice this for the next couple of days. We did not think this was anything serious. On 09/16/2015, Kenya began feeling very painful cramps. We called 911 and she was transported by paramedic to Mercy Hospital. She was then transported to HUP (Hospital at the University of Pennsylvania) where she was transported to labor and delivery. She experienced a miscarriage. The doctors informed us that our baby was developing healthily and normally. Her amniotic sac lost too much fluid to

police misconduct

3 messages

DARUS HUNTER <darus@sas.upenn.edu>

To: philadelphia.complaints@ic.fbi.gov

Tue, Nov 17, 2015 at 1:33 PM

Dear FBI of Philadelphia,
please review the following events which took place on September 16th of this year:

Darus Leon Hunter

1242 South 51st street, Philadelphia PA 19143

(215) 303-8787 [cell], (215) 727-1508 [home]

I was in my home on 09/16/2015 at approximately 11:59 pm, when I heard a loud banging on my front door. I got out of bed and walked into the living room. I noticed that my son had opened the front door and two police officers were standing in the doorway. As they began to proceed into my home, I walked over and stood in their way and asked what they wanted. They asked where Khadira (my 7 year-old-daughter) was. As I escorted the officers to my front porch, I explained that she was in bed asleep. One of the police officers told me to get her up. He said that her mother (Cinquetta Muhammad) had come into the station, complaining that our daughter was not home on time. After I woke her up I asked what he wanted me to do. While we were speaking, my girlfriend retrieved a copy of our existing custody order. I explained to the officer that all district schools were closed the following day and that she was spending the night. I displayed the messages from the week before which demonstrated that we had followed the same plan when school was off for labor day. The officer looked at the documents and he and his partner left. I called the 12th district and stated that I wished to file a complaint against the (2) officers for attempting to walk into my home and shining their flashlights into my children's faces. I was told that I needed to call 911 in order to file a complaint. I called 911 and stated that I wanted to file a complaint against the officers. The 911 operator told me that I needed to call the police district where the incident occurred. I called the 12th district again and asked for a supervisor. My call was referred to a Sgt. Melner. He told me that I needed to dial 911 in order to file a complaint against the officers and that he didn't have their names. At approximately 1:00 am, the officers Naveedo and Schute returned to my home. They were again banging on my door very loudly and violently. My girlfriend Kenya J Shujaa began opening the door when one of the officers forcefully pushed the door into her belly, knocking her backward. I asked the officer "what the hell he was doing?" He told me to calm down and warned me not to get myself "locked-up". He stated "Oh you want to file a complaint against me, right?" I just said that I wanted him to leave me alone. He again shined his flashlight into my home. He and his partner left again. I called the 12th district again and was referred to Sgt. Melner who again told me that I needed to call 911 in order to file a complaint. The officers returned to my home for a third time at approximately 1:30 am and banged on and kicked my door. I opened the door and asked what the officers wanted. The officer asked if I had a problem with him. I said that it was over and I just wanted to go to bed. The officers again left. I called 911 again and asked for a supervisor. The call was transferred to a Sgt. Hameen police radio #358. I told him what Sgt. Melner had stated and he (Sgt. Hameen) said that Sgt. Melner was lying if he claimed to not have the officers' names. I called back to the 12th district and asked for a supervisor and was again transferred to Sgt. Melner, who again told me that I needed to call 911 in order to file a complaint. I informed him of my conversation with Sgt. Hameen and that he had given me his police radio number. Sgt. Melner then informed me that the officers names were Naveedo and Schute. I returned to bed. The following day, my daughter Khadira asked why the police were in my home. I told her that the police had made a mistake in coming to our house. On 09/14/2015, my girlfriend

Exhibit M

Kenya J. Shujaa, who was 18 1/2 weeks pregnant at that time, noticed a slight clear discharge of fluid on her leg. She continued to notice this for the next couple of days. We did not think this was anything serious. On 09/16/2015, Kenya began feeling very painful cramps. We called 911 and she was transported by paramedic to Mercy Hospital. She was then transported to HUP (Hospital at the University of Pennsylvania) where she was transported to labor and delivery. She experienced a miscarriage. The doctors informed us that our baby was developing healthily and normally. Her amniotic sac lost too much fluid to support our developing baby. Our baby died as a result. I believe the loss of fluid was the direct result of the blunt force trauma experienced when the officer forcefully pushed my front door into my girlfriend's belly during his second visit to our home on this night.

Sincerely,

Darus Hunter Sr.

Philadelphia Complaints <Philadelphia.Complaints@ic.fbi.gov>
To: DARUS HUNTER <darus@sas.upenn.edu>

Tue, Nov 17, 2015 at 1:57 PM

Thank you for your email to the FBI. After evaluating your information, it is our determination that your case is one in which the FBI does not have jurisdiction to further investigate. You are advised to Internal Affairs and an attorney.

From: DARUS HUNTER [mailto:darus@sas.upenn.edu]
Sent: Tuesday, November 17, 2015 1:34 PM
To: Philadelphia Complaints
Subject: police misconduct

[Quoted text hidden]

DARUS HUNTER <darus@sas.upenn.edu>
To: Philadelphia Complaints <Philadelphia.Complaints@ic.fbi.gov>

Tue, Nov 17, 2015 at 2:13 PM

Exhibit M

FBI,
OK, thanks.

Darus Hunter

[Quoted text hidden]

Exhibit N

DARUS HUNTER <darus@sas.upenn.edu>

RE: Official Police Misconduct Complaint: W-IAD-3976

Police Cpl_IAD_Intake <Police.Cpl_IAD_Intake@phila.gov>
To: Darus Hunter <darus@sas.upenn.edu>

Mon, Sep 21, 2015 at 10:19 AM

Good morning Mr. Hunter,

Your complaint has been received. We are working on it. Thank you for your patience.

Officer Harris #5641

Internal Affairs

From: admin=phillypolice.com@mg.phillypolice.com [admin=phillypolice.com@mg.phillypolice.com] on behalf of Philadelphia Police Department
[admin@phillypolice.com]
Sent: Sunday, September 20, 2015 12:10 PM
To: PPD Internal Affairs
Subject: Official Police Misconduct Complaint: W-IAD-3976

A new submission from the **Official Complaint** form has been received.

Complainant

Complainant First Name Darus
Complainant Middle Name L
Complainant Last Name Hunter
Complainant Street 1242 South 51st street
Complainant City Philadelphia
Complainant State Pennsylvania
Complainant Zip Code 19143
Complainant Age 42

Exhibit N

Complainant DOB 10/27/1972
Complainant Gender Male
Complainant Race Black or African American
Complainant Occupation graduate student
Complainant Phone 215-303-8787
Complainant Email darus@sas.upenn.edu

Victim of Incident

Victim Full Name Kenya J Shujaa
Victim Phone 215-727-1508
Victim Email shujaak@gmail.com
Victim Street 1242 South 51st street
Victim City Philadelphia
Victim State Pennsylvania
Victim Zip Code 19143
Assistant State Select State...

Witnesses

Witness 1

Witness1 Full Name Khadira Muhammad
Witness1 Tel 2157271508
Witness1 Email n/a
Witness1 Street 1242 South 51st street
Witness1 City Philadelphia
Witness1 State Pennsylvania
Witness1 Zip Code 19143
Witness2 State Select State...
Witness3 State Select State...

Officer(s) Complained Against

Exhibit N

Officer 1

Officer1 Full Name	Schutte
Officer1 Rank	Police Officer
Officer1 District	12th district
Officer1 Uniform	Uniform
Officer1 Duty Status	On-Duty
Officer1 Transportation	Van
Officer1 Height	5'9
Officer1 Weight	180
Officer1 Hair	Brown
Officer1 Eyes	Select Eyes...
Officer1 Gender	Male
Officer1 Age	approximately 25
Officer1 Race	White
Officer1 Additional Details	

Officer 2

Officer2 Full Name	Naveedo
Officer2 Rank	Police Officer
Officer2 District	12th district
Officer2 Uniform	Uniform
Officer2 Duty Status	On-Duty
Officer2 Height	5'8
Officer2 Weight	175
Officer2 Hair	Brown
Officer2 Eyes	Select Eyes...
Officer2 Gender	Male
Officer2 Age	approximately 27
Officer2 Race	Asian
Officer2 Additional Details	

Description of Complaint

Date of Incident	09/16/2015
Time of Incident	11:59 pm
Location of Incident	1242 South 51st street, Philadelphia PA 19143

Exhibit N

Incident Description

I was in my home on 09/16/2015 at approximately 11:59 pm, when I heard a loud banging on my front door. I got out of bed and walked into the living room. I noticed that my son had opened the front door and two police officers were standing in the doorway. As they began to proceed into my home, I walked over and stood in their way and asked what they wanted. They asked where Khadira (my 7 year-old-daughter) was. As I escorted the officers to my front porch, I explained that she was in bed asleep. One of the police officers told me to get her up. He said that her mother (Cinquetta Muhammad) had come into the station, complaining that our daughter was not home on time. After I woke her up I asked what he wanted me to do. While we were speaking, my girlfriend retrieved a copy of our existing custody order. I explained to the officer that all district schools were closed the following day and that she was spending the night. I displayed the messages from the week before which demonstrated that we had followed the same plan when school was off for labor day. The officer looked at the documents and he and his partner left. I called the 12th district and stated that I wished to file a complaint against the (2) officers for attempting to walk into my home and shining their flashlights into my children's faces. I was told that I needed to call 911 in order to file a complaint. I called 911 and stated that I wanted to file a complaint against the officers. The 911 operator told me that I needed to call the police district where the incident occurred. I called the 12th district again and asked for a supervisor. My call was referred to a Sgt. Melner. He told me that I needed to dial 911 in order to file a complaint against the officers and that he didn't have their names. At approximately 1:00 am, the officers Naveedo and Schute returned to my home. They were again banging on my door very loudly and violently. My girlfriend Kenya J Shujaa began opening the door when one of the officers forcefully pushed the door into her belly, knocking her backward. I asked the officer "what the hell he was doing?" He told me to calm down and warned me not to get myself "locked-up". He stated "Oh you want to file a complaint against me, right?" I just said that I wanted him to leave me alone. He again shined his flashlight into my home. He and his partner left again. I called the 12th district again and was referred to Sgt. Melner who again told me that I needed to call 911 in order to file a complaint. The officers returned to my home for a third time at approximately 1:30 am and banged on and kicked my door. I opened the door and asked what the officers wanted. The officer asked if I had a problem with him. I said that it was over and I just wanted to go to bed. The officers again left. I called 911 again and asked for a supervisor. The call was transferred to a Sgt. Hameen police radio #358. I told him what Sgt. Melner had stated and he (Sgt. Hameen) said that Sgt. Melner was lying if he claimed to not have the officers' names. I called back to the 12th district and asked for a supervisor and was again transferred to Sgt. Melner, who again told me that I needed to call 911 in order to file a complaint. I informed him of my conversation with Sgt. Hameen and that he had given me his police radio number. Sgt. Melner then informed me that the officers names were Naveedo and Schute. I returned to bed. The following day, my daughter Khadira asked why the police were in my home. I told her that the police had made a mistake in coming to our house. On 09/14/2015, my girlfriend Kenya J. Shujaa, who was 18 1/2 weeks pregnant at that time, noticed a slight clear discharge of fluid on her leg. She continued to notice this for the next couple of days. We did not think this was anything serious. On 09/16/2015, Kenya began feeling very painful cramps. We called 911 and she was transported by paramedic to Mercy Hospital. She was then transported to HUP (Hospital at the University of Pennsylvania) where she was transported to labor and delivery. She experienced a miscarriage. The doctors informed us that our baby was developing healthily and normally. Her amniotic sac lost too much fluid to support our developing baby. Our baby died as a result. I believe the loss of fluid was the direct result of the blunt force trauma experienced when the officer forcefully pushed my front door into my girlfriend's belly during his second visit to our home on this night.

Signature

Signed
Sign Date

DARUS LEON HUNTER
09/20/2015

Submitted: 2015-09-20 4:10 PM
Submission ID: W-IAD-3976

Exhibit 0



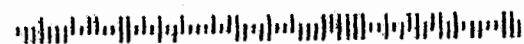
CITY OF PHILADELPHIA
PHILADELPHIA POLICE DEPARTMENT
8th & Race Streets
Philadelphia, PA 19106

Closing Letter #15-0568
Office of Professional Responsibility
7790 Dungan Road
Philadelphia PA 19111

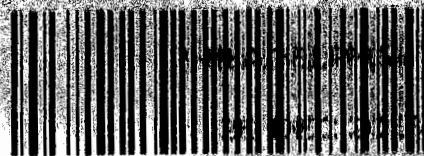
Ms. Kenya Shujaa
1242 S. 51st Street
Philadelphia, PA 19143

POLICE EMERGENCY
DIAL 9-1-1

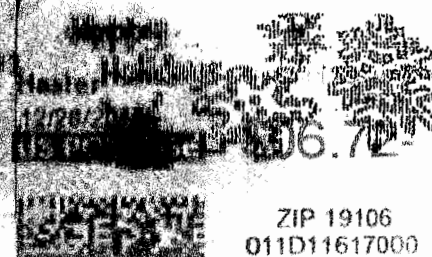
19143434442



CERTIFIED MAIL



7014 0150 0000 0151 3338



ZIP 19106
011D11617000

Exhibit 0



CITY OF PHILADELPHIA

POLICE DEPARTMENT
HEADQUARTERS, FRANKLIN SQUARE
PHILADELPHIA, PENNSYLVANIA 19106

Charles H. Ramsey
Commissioner

December 23, 2015

Ms. Kenya Shujaa
1242 S. 51st Street
Philadelphia, PA 19143

Dear Ms. Shujaa,

I am responding for the Police Commissioner with regard to the complaint you filed with the Internal Affairs Division on September 21, 2015. Lieutenant Joseph McGarrey, Internal Affairs Division, conducted an investigation regarding your allegations of physical abuse, harassment, and did not receive proper service.

The investigation did not support the allegation and was closed with a conclusion of **UNFOUNDED**.

If you are interested in personally reviewing your case, please call the Internal Affairs Division Administrative Officer, Lieutenant Brad Lukach, at 215-685-5008 for an appointment. The Internal Affairs Division is located at 7790 Dungan Road and business hours are between 9 AM and 5 PM weekdays. Your case number is #15-0568.

Sincerely,

A handwritten signature in black ink, appearing to read 'Christopher Flacco'.

Christopher Flacco
Chief Inspector
Office of Professional Responsibility

cc: District Attorney, Seth Williams
Police Officer Michael Melvin, 12th Police District
Police Officer Robert Schutte, 12th Police District
Police Officer Michael Navedo, 12th Police District
IAD #15-0568

Sent by Certified Mail 7014 0150 0000 0151 3338

Exhibit



CITY OF PHILADELPHIA
PHILADELPHIA POLICE DEPARTMENT
8th & Race Streets
Philadelphia, PA 19106
Open Records Office, Rm 203

MAILED 01 19 15

15

Nasler
10/05/2015
DISPATCH
10/05/2015

POSTAGE
\$00.47
ZIP 19106
011011617X20

Mr. Darus Hunter
1242 South 51st St.
Philadelphia, PA 19143

POLICE EMERGENCY
DIAL 9-1-1

HAHRSMF 19143



Exhibit P



CITY OF PHILADELPHIA

POLICE DEPARTMENT
HEADQUARTERS, FRANKLIN SQUARE
PHILADELPHIA, PENNSYLVANIA 19106

CHARLES H. RAMSEY
Commissioner

October 5, 2015

Mr. Darus Hunter
1242 South 51st St.
Philadelphia, PA 19143

RE: Pennsylvania Right-To-Know Act Request

Dear Mr. Hunter:

Your Pennsylvania Right-To-Know Act request dated 09-28-15 was received by this office on 09-28-15 for:

1. I request the 911 recording transcripts of my 911 emergency calls placed on 9/13/15 at approximately 11:50pm and all subsequent calls placed on 9/14/15 at approximately 12:00am and later that day 9/14/15.

After processing your request, the Philadelphia Police Department's determination is as follows:

Your request is initially **denied [in whole]** pursuant to Section 708(b)(16) et seq. and Section 708(b)(17) et seq. of the RTKA. The requested information pertains to a record of an agency that may be related to a criminal investigation. The investigation may also be related to a non-criminal investigation. The Right-to-Know Law **clearly exempts all records consistent with** a criminal or non-criminal investigation, whether ongoing or closed, from disclosure (65 P.S. § 67.708(b)(16) et seq.) & (65 P.S. § 67.708(b)(17) et seq.).

Your request is additionally **denied**. "**Records or parts of records...pertaining to audio recordings, telephone or radio transmissions received by emergency dispatch personnel, including 911 recordings**" is exempt from disclosure pursuant to 65 P.S. § 67.708(b)(18)(i).

Exhibit P

DARUS HUNTER
PENNSYLVANIA RIGHT-TO-KNOW ACT REQUEST: 09-28-15

10-05-15
Page Two

Should you wish to contest any part of this decision, other than the denial pursuant to 65 P.S. § 67.708(b)(16) regarding records relating to a criminal investigation, you may file an appeal with the Office of Open records as provided for in 65 P.S. § 67.1101. You have 15 business days from the mailing date of the City's response to challenge the response. Please direct any appeal to the :

Office of Open Records
Commonwealth Keystone Building
400 North Street, 4th Floor
Harrisburg, PA 17120-0225

To appeal the denial pursuant to 65 P.S. § 67.708(b)(16) regarding records relating to a criminal investigation, you may file an appeal with the Philadelphia District Attorney's Office as provided in 65 P.S. § 67.1101 and 65 P.S. § 503(d)(2). You have 15 business days from the mailing date of the City's response to challenge the response. Please direct any appeal to:

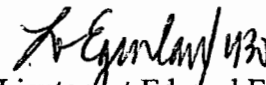
DA Appeals Officer
Attn: Priya Travassos
Three South Penn Square
Philadelphia PA 19107-3499

Please be sure to copy **Mr. Jeffrey Cohen, Assistant City Solicitor for the City of Philadelphia Law Department** on your appeal if an appeal is made. Mr. Cohen is located at One Parkway Building, 17th Floor, 1515 Arch Street, Philadelphia, PA 19102.

Be advised that if no appeal is made within the listed period, then this correspondence will service to close this particular request with our office as permitted by law. Thank you for contacting the Philadelphia Police Department's Open Records Office.

FOR THE POLICE COMMISSIONER

Respectfully submitted,



Lieutenant Edward Egenlauf
Open Records Officer
Philadelphia Police Department
750 Race Street, Room 203
Philadelphia, PA 19106
Fax: 215-686-1183
Email: police.righttoknow@phila.gov